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December 23, 2010

VIA CM/ECF

Honorable Ann Marie Donio, U.S.M.J.  
United States District Court  
For the District of New Jersey  
Mitchell H. Cohen Courthouse  
1 John F. Gerry Plaza  
Camden, New Jersey 08101

**RE: Holtec International Corporation v. Preferred Metal Technologies,  
Inc. v. UPS Ground Freight, Inc. d/b/a UPS Freight f/k/a Overnite  
Transportation  
Civil Action No. 09-CV-274(RMB/AMD)  
Our File No. 2514.114**

Dear Judge Donio:

We represent the Third-Party Defendant, UPS Ground Freight, Inc. d/b/a UPS Freight f/k/a Overnite Transportation ("UPS Freight").

We write to respectfully request an extension of the return date of our motion for summary judgment from January 3, 2011 to the next available return date of January 18, 2011.

We filed our motion for summary judgment on November 17, 2010. A return date of December 20, 2010 was scheduled. Counsel for Defendant/Third-Party Plaintiff, Preferred Metal Technologies, invoked Local Civil Rule 7.1(d)(5) to extend the return date for two (2) weeks. Accordingly, the return date was extended from December 20, 2010 to January 3, 2011.

Defendant/Third-Party Plaintiff, Preferred Metal Technologies then timely filed and served its opposition papers on December 20, 2010. With a January 3, 2011 return date our Reply thereto is due on December 27, 2010.

In light of the short week this week, we respectfully request an extension of the return date from January 3, 2011 to January 18, 2011 so we can have some additional time to consult with our client on the opposition and prepare, file and serve our Reply papers. The requested extension of the return date would mean our Reply deadline would be extended from December 27, 2010 to January 10, 2011 as per the new proposed return date.

We contacted all counsel by e-mail and have obtained their consent.

There have been no prior extensions of time to file Reply papers on the pending motion.

We thank the Court for its attention to this matter.

Respectfully submitted,

Nowell Amoroso Klein Bierman, PA

  
S/ Thomas C. Martin

Thomas C. Martin

TCM/bb

Cc: Renee Marie Bumb, U.S.D.J.  
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